ATTACHMENT A

EOR THE DISTRICT OF DELAWARE IN THE UNITED STATES DISTRICT COURT

•	Defendant,
	NABSTAR, LLC d/b/a SLEEP INN
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Civil Action No. 05-CV-0374 (GMS)	Hitnis14
· (COMMISSION'
(EQUAL EMPLOYMENT OPPORTUNITY

BEGIND OL DOCUMENTSDEFENDANT'S RESPONSE TO PLAINTIFF'S SECOND REQUEST FOR

I. Produce any and all documentation of customer complaints in any form, including but not limited to guest comment cards against any employee of Nabstar, LLC Sleep Inn, Newark, Delaware location from August 1, 2003 to the present.

KESPONSE

Defendant objects to this request to produce on the grounds that it seeks information that is not relevant to the subject matter of the pending action, seeks information which is not reasonably calculated to lead to the discovery of admissible evidence and is overly broad and burdensome inasmuch as it seeks documents related to employees other than Islyn Palmer and is also not limited to a reasonable time period. Without waiving these objections and subject to them, defendant is undertaking to search for documentation of customer complaints relating to Islyn Palmer. If they exist, they will be produced to plaintiff.

2. Produce any and all personnel files, employee files, and other relevant documents, of the employees of the Nabatar, LLC Sleep Inn, Newark, Delaware location between August I, 2003 and the present that is in the custody, control or possession of Defendant.

KEZLONZE

Defendant objects to this request to produce on the grounds that it seeks information that is not relevant to the subject matter of the pending action, seeks information which is not

reasonably calculated to lead to the discovery of admissible evidence and is overly broad and burdensome inasmuch as it seeks documents related to employees other than Islyn Palmer and is also not limited to a reasonable time period. Objection further to the extent this request to produce seeks the production of "other relevant documents" inasmuch as that phrase is not defined by plaintiff and defendant is therefore unable to respond.

3. Produce any and all business records that reflect a full and complete list of registered guests, including but not limited to the names, addresses, and telephone numbers of all guests of Sleep Inn in Newark, Delaware for the week of August 1, 2004 to August 8, 2004 that is in the custody, control or possession of Defendant.

KESLONZE

Defendant objects to this request to produce on the grounds that it seeks documents which are irrelevant to the subject matter of the pending litigation and which are not reasonable calculated to lead to the discovery of admissible evidence. Defendant understands that the subject request to produce is based upon customer comment cards which were previously produced in error to plaintiff by defendant because those comment cards did not apply to the August 2003 time period when Islyn Palmer worked. Defendant is amending its prior discovery responses to withdraw the referenced two (2) written customer comment cards, thereby rendering this request to produce moot.

COFEMAN & GOGGIN MARSHALL, DENNEHEY, WARNER,

1220 North Market Street, 5^{th} Fl. P.O. Box 8888

Wilmington, DE 19899-8888 Attorney for Defendant, Nabatar, LLC, d/b/a Sleep Inn DATED: March 20, 2006